

NOBLE DRILLING SERVICES INC.

PHONE: (281) 276-6100
DIRECT: (281) 276-6235

13135 SOUTH DAIRY ASHFORD, SUITE 800
SUGAR LAND, TEXAS 77478

Compliance FAX: (281)- 596-4470
Engineering FAX: (281) 491-3284

Jim Gormanson
Compliance Manager

29 July 2003

Docket Management Facility
(USCG-2003-14733)
U.S. Department of Transportation, Room PL-401
400 Seventh Street SW.
Washington, DC 20590-0001

Re: Area Mar-time Security
[Docket: USCG-2003-14733]

To Whom It May Concern:

This letter is on behalf of Noble Corporation and its subsidiaries, which own and operate 57 Mobile Offshore Drilling Units world-wide with 14 operating in the U.S. Gulf of Mexico. Of these rigs, nine are U.S. vessels.

The Temporary Interim Rule on Implementation of National Maritime Security Initiatives [Docket: USCG-2003-14733], which appeared in the 1 July 2003 *Federal Register*, requested comments. I offer the following comments:

1. Regarding § 103.200 Designation of the Federal Maritime Security Coordinator (FMSC).

Comment: The USCG needed to treat the US Gulf of Mexico Outer Continental Shelf as a single area under the Eighth District Commander. CCGD8 would then exercise the FMSC duties per § 101.400(a).

2. Regarding § 103.300 Area Maritime Security (AMS) Committee.

Comment: A separate AMS Committee is needed to address the issues relevant to the Outer Continental Shelf Activities. This can not be handled by any one COTP as the OCS activities encompass various vessel types operating from ports in each zone to service a multitude of OSC facilities and vessels engaged in exploration and exploitation of the oil and mineral resources of the OSC.

3. Noble supports the comments of the International Association of Drilling Contractors.

Sincerely,

James W. Gormanson

cc: Dave Beard